

Morse, Bob

From: Morse, Bob
Sent: Tuesday, February 11, 2020 1:27 PM
To: Moore, James T CIV USARMY CENAN (USA)
Cc: Pocze, Doug; Melissa.Sweet@dec.ny.gov; Mason, John; mark.sergott@health.ny.gov
Subject: EPA Comments on Seneca PFAS ESI Phase 2 draft Tech Memo (Fire House and SEADs 25 and 26)

Categories: EZ Record - Shared

Hi Jim.

EPA has reviewed the Seneca PFAS ESI Phase 2 draft Tech Memo (Fire House and SEADs 25 and 26). EPA comments on the draft Tech Memo are presented below.

Fire House

1. Currently, installation of a downgradient bedrock well pair is planned if PFAS are found in bedrock within the source area. It is recommended that the proposed bedrock well pair downgradient of the Fire House also be installed if PFAS are found in bedrock within SEAD 25. This installation would further characterize potential PFAS transport pathways to SEAD 25.

SEAD 25

1. Another bedrock well pair to the northeast of 25-2 is recommended for the delineation of groundwater flow patterns and potential PFAS transport paths in the area which experiences anomalous overburden radial flow conditions and the highest observed PFAS concentrations.
2. The February 2019 Response to Comments states that additional wells will be installed to further delineate the extent of PFAS contamination in the area of MW25-24 and MW25-23 if PFAS were detected in these wells during the first round of sampling. Given that PFAS were detected here in the most recent sampling events, we recommend following through on this action, particularly in the vicinity of MW25-24.
3. It is unclear whether the wells farthest downgradient in SEAD25 (e.g. MW25-28, MW25-29) are being utilized to determine groundwater flow conditions. Please clarify and provide a compilation of groundwater elevation measurements.

SEAD 26

1. It is unclear how the 2017 temporary monitoring well installation and sampling details compare to the more recently-installed permanent wells. Is there an existing compilation of the as-constructed well depths for the wells and temporary wells across the area? If possible, please provide this information for the Fire House and SEAD 25 wells also.
2. Table – Additional data gap: Temporal variability in PFAS concentrations in source-proximal locations.

Additional sampling rounds will occur for the new permanent wells, but it does not appear that PFAS concentrations will be further investigated via additional sampling in the source-proximal areas where temporary wells were installed and PFAS were detected above the proposed current and projected regulatory criteria (i.e. in a number of the areas sampled by the TMW's).

3. It is unclear how “shallow” and “deep” are defined with respect to bedrock well installation, and whether this definition is identical across areas being considered in this investigation. Please clarify.
4. Please confirm that groundwater elevation measurements will be taken during all of the upcoming sampling events in order to further refine understanding of groundwater flow patterns.
5. Based on the results of the 2017 temporary well sampling and in anticipation of the lowering of the NY PFAS regulatory standard, a new well is recommended in order to delineate the southern edge of the plume just downgradient of the suspected source areas in SEAD 26.

End of Comments –

Please let me know if you have any questions. Thank you.

Bob

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